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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SCOTT MARTING SEIPP,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01253-EJY

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion to Remand (Dkt. No. 15, filed on November 15, 2022), currently due on December 15, 2022, by 30 days, through and including January 17, 2022. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 14) be extended accordingly.

1 This is Defendant's first request for an extension of time. Good cause exists for this extension  
2 due to Defendant's need for more time to consult with the client. Defendant has reached out to the  
3 client to discuss settlement options, but does not expect a response until December 19, 2022. While  
4 Defendant intends to act promptly after receiving the client's response, given the impending holidays  
5 and in an attempt to avoid a further request for extension, Defendant asks for a 30-day extension.

6 This request is made in good faith and with no intention to unduly delay the proceedings, and  
7 counsel apologizes for any inconvenience.

8 On December 9, 2022, counsel for Defendant conferred with Plaintiff's counsel, who has no  
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
11 to Plaintiff's Motion for Reversal and Remand, through and including January 17, 2022.

12  
13 Dated: December 9, 2022

Respectfully submitted,

14 JASON M. FRIERSON  
15 United States Attorney

16 /s/ Heidi L. Triesch  
HEIDI L. TRIESCH

17 Special Assistant United States Attorney  
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21 IT IS SO ORDERED:

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24 UNITED STATES MAGISTRATE JUDGE

25 DATED: December 9, 2022  
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